

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TYLER DIVISION**

**LADARION HUGHES, ANGELA  
ALONZO, and DEMARCUS LIVELY,**

*Plaintiffs,*

**v.**

**SMITH COUNTY, TEXAS,**

*Defendant.*

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**Civil Action No. 6:23-cv-344**

**THE PARTIES' JOINT MOTION TO EXTEND DISCOVERY DEADLINES**

TO THE HONORABLE JUDGE OF SAID COURT:

COME NOW the Parties in the above-styled and -numbered cause and file this their Joint Motion to Extend the existing deadlines, and would respectfully show unto the Court as follows:

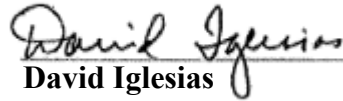
On October 30, 2023, the Court entered its Order [#12] governing discovery. The Order requires that all fact discovery be completed by June 24, 2024. (Order [#12], p. 2.)

Although the Parties have completed significant discovery heretofore, they now respectfully request that the Court extend the written discovery and document production deadline. They propose a final written fact discovery deadline of September 20, 2024, and a final oral discovery deadline of November 20, 2024. Specifically, the Parties have exchanged significant discovery in the present case. At this point, over 10,000 pages of documents have been produced. The voluminous discovery has led the Parties to the conclusion that an extension is necessary for the Parties to adequately prosecute and defend against the claims in this case. This extension is not requested solely for delay, but so that justice may be done.

WHEREFORE, PREMISES CONSIDERED, the Parties respectfully request that the Court extend the final written discovery and document production deadline to September 20, 2024, and the final oral

discovery deadline to November 20, 2024, and for any and all relief, at law or in equity, to which he has shown himself to be justly entitled.

Respectfully submitted,



**David Iglesias**

Lead Counsel

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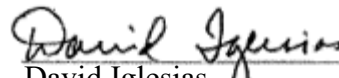
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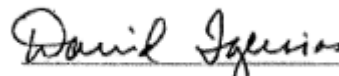
**CERTIFICATE OF SERVICE**

I hereby certify that on June 20, 2024, a copy of the foregoing was transmitted to all counsel of record in the above-referenced and -numbered action via electronic filing system.

  
David Iglesias

**CERTIFICATE OF CONFERENCE**

I hereby certify that on June 18, 2024, the undersigned attorney contacted Plaintiffs' Counsel regarding their position on this Motion. After discussing its merits, the Parties have agreed to file this Motion jointly.

  
David Iglesias